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Attorneys for Rabo AgriFinance LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

<p>In re:</p> <p>MCCLAIN FEED YARD, INC., MCCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.</p> <p>Debtors.</p>	<p>CASE NO. 23-20084-rlj7 Chapter No. 7</p> <p>(Jointly Administered Cases)</p>
<p>KENT RIES, CHAPTER 7 TRUSTEE FOR THE BANKRUPTCY ESTATES OF MCCLAIN FEED YARD, INC., MCCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.</p> <p><i>Plaintiff,</i></p>	<p>ADV. PROC. NO. 25-02005</p> <p>Honorable Scott W. Everett</p>

v. COMMUNITY FINANCIAL SERVICES BANK; HTLF BANK; MECHANICS BANK; and RABO AGRIFINANCE LLC, <i>Defendants.</i>	
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**RABO AGRIFINANCE LLC’S MOTION TO DISMISS
TRUSTEE’S SECOND AMENDED ADVERSARY COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 8, 9(b), 12(b)(1), and 12(b)(6), made applicable to this Adversary Proceeding by Rules 7008, 7009, and 7012 of the Federal Rules of Bankruptcy Procedure, and pursuant to 28 U.S.C. § 1404(a) and/or the doctrine of *forum non conveniens*, Defendant Rabo AgriFinance LLC (“**Rabo**”), through counsel, hereby submits this motion to dismiss *Trustee’s Second Amended Adversary Complaint* filed by Kent Ries, Chapter 7 Trustee (“**Plaintiff**” or “**Trustee**”).

The Trustee purports to assert twelve claims against Rabo—six “state law” or “non-core” claims and six “core” claims. Pursuant to Local Bankruptcy Rule 7001-1, Rabo has filed concurrently herewith a brief in support of this Motion setting forth Rabo’s argument, authorities, and contentions of law demonstrating that all twelve claims should be dismissed.

WHEREFORE, Rabo respectfully requests that its Motion be granted in its entirety and that all claims against Rabo be dismissed.

DATED: July 31, 2025.

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/s/ Michael R. Johnson

Michael R. Johnson

Attorneys for Rabo AgriFinance LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2025, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which sent notice of electronic filing to all electronic filing users in this case.

/s/ Michael R. Johnson

Michael R. Johnson

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